



Mercedes-Benz

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Mercedes-Benz
of North America, Inc.

November 16, 1998

Wayne H. Samson
Vice President
and General Counsel

The Honorable Carol M. Browner
Administrator
Environmental Protection Agency
Washington, D.C. 20460

ORIGINAL

Dear Ms. Browner:

Thank you for your recent invitation to Mercedes-Benz of North America, Inc., to participate in the Environmental Protection Agency's (EPA) High Production Volume (HPV) Challenge Program. Mercedes-Benz supports governmental efforts to work cooperatively with industry to address environmental issues of concern, and the HPV Program appears to be a promising route to increase knowledge of the environmental and health impacts of widely used chemicals.

Based on your description of the program, it is designed to encourage voluntary research projects among companies in the chemical industry that manufacture or produce chemicals classified as HPV. Mercedes Benz is an importer and distributor of automotive vehicles, and neither manufactures nor produces any chemicals in the course of its regular business operations. Thus, we have no experience or resources to offer with respect to HPV chemicals. Accordingly, we do not believe this program was intended to apply to a company such as Mercedes-Benz.

We wish you every success in implementing the HPV Program. Hopefully, it will prove to be a model demonstration of the benefits that attain when government and industry cooperate to meet regulatory needs. If you have any questions or comments regarding this response, please feel free to call me at 201-573-2225 or our counsel in Washington, Mr. Patrick Raher of Hogan & Hartson, L.L.P. at 202-637-5682.

Sincerely,

Wayne H. Samson

WHS/ts

cc: P. Raher, Esq.
M. Bassermann

